

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i>	Yes	Complaints Policy - 6.1 Easy to read guide Website	This definition is clearly outlined in our Policy. The 2023 version was ratified by our board in 2023 and amended in line with the new handling code in June 2024
1.3	A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.	Yes	Complaints Policy sections 6.2 and 7.3 Website Easy to read guide Service standards – to be approved by BHA Board July 2024	This is explicit in the Policy
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Complaints Policy – section 9 addresses all of 1.4 and 1.5 Easy to read guide Website	Service Requests have been added to the new complaint policy reviewed June 2024 to ensure handling code compliance All service requests are logged and monitored for completion and compliance

1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.			See above
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Complaints Policy sections, 14.5 14.6 14.7	The Complaints Policy outlines how to complain in all correspondence to tenants and via publications. Anything about the acuity survey mentioning this?

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Complaints Policy sections 1.3, 1.4, 6.4, 6.5, 6.6 and section 13	The policy is compliant with the requirements> It outlines there BHA would not accept a complaint and how we would deal with this matter
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	Complaints Policy sections 1.3, 1.4, 6.4, 6.5 6.6 and section 13	The policy explains the circumstances of exclusion and escalation and lists the acceptable exclusions, this would include the unreasonable behaviour

2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	Complaints Policy sections 6.4, 6.5, 6.6 ,6.7	The policy clearly outlines the discretion to accept a complaint outside of these times
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	Complaints Policy sections 1.3 6.5, 6.6 ,6.7	The policy clearly outlines the process for accepting a complaint and the rights of the resident to contact the ombudsman and that the ombudsman can overturn this decision
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Complaints Policy 1.3 and 6.6	Each complaint will be considered on its own merit.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	Complaints Policy Sections 4.1, 5.1, 5.2, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.8 and 7.9	Section 4.1 explains that any staff member can receive a complaint on behalf of BHA. 5.1 and 5.2 ensures the policy is applied in line with the Equality Act 2010 and reasonable adjustments Throughout section 7 the policy advises tenants the formats and forums they can use to complain, providing advice on third party involvement and that any reasonable adjustments required to make a complaint will be considered
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	Complaints Policy Sections 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.8, 7.9 and 14.4	Throughout section 7 the policy advises the tenants that formats and forums they can use to complain, section 14 advises of the requirements for annual staff training on the processes
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Complaints Policy – Section 14 and BHA website	Section 14 of the complaints policy outlines all ways BHA inform residents and stakeholders of our complaints policy, outcomes and lessons learnt, it also informs where we publicise our complaints handling processes.
3.4	Landlords must make their complaint	Yes	Complaints Policy	The complaints policy is accessible in

	policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the time frames for responding. The policy must also be published on the landlord's website.		sections 5.2, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.9 and 14.8 Easy to read guide and website	other formats, on various platforms and BHA website. We have an easy-to-read guide for tenants on our website which is included in sign up packs and as posters across our properties outlining the 2-stage process
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Complaints Policy 4.5 and 14.8, easy to read guide, newsletters, and website	These sections of the policy outline the details of where we publicise the complaints process, ombudsman scheme and how we monitor the handling code compliance
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Complaints Policy 5.1, section 7, 10.4 and 11.7, website and easy to read guide	The complaints policy, our policy outline on the website and our easy-to-read guide advises of resident's rights to be accompanied or represented
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Complaints Policy 1.4, 6.7, 7.6, 8.6, 9.7, 10.8, 10.13, 11.3, and Section 12 BHA website, posters on the estates and easy to read guide	The policy outlines the right to contact the housing ombudsman service

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	Complaints Policy – sections 4.1,4.3, 4.4, 4.5, 4.6, 4.7, 8.1,8.3,8.4,8.5,10.1,11.1 and 14.4	The Housing and Communities Director for BHA is the responsible complaints handler with full authority and autonomy across the entire process of complaint handling
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Complaints Policy 4.3, 8.4, 8.5	The Housing and Communities Director with full delegated authority and autonomy across the complete process of complaint handling
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Complaints Policy 4.4 ,4.5, 14.1, 14.2, 14.3, 14.5 Key performance indicators	Staff attended annual complaints training, we also ensure staff are trained on unconscious bias and equality which all feed into the delivery of the complaints policy. Our board members monitor

				complaints through KPI outputs and ensure the effectively delivery of the complaint services and what lessons have been learnt. Our annual report informs residents of our lessons learnt, actions we have taken and how we have changed services as a result of complaints.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	Complaints Policy 2.1, 4.3 5.1, 5.2, 6.5 and 6.6 and easy to read guide	BHA have one single complaints policy, which incorporates the equality act and treats people fairly and objectively, with each complaint considered on its own merits Our policy informs that we welcome feedback, and this is reviewed at senior and board level
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal	Yes	Complaints Policy 5.2, 7.9 and 9.1, BHA website and easy to read guide	BHA will act quickly to identify the issues in a complaint and put them right in a fair and consistent manner.

	complaint') as this causes unnecessary confusion.			BHA have removed informal stages of complaints process from the 2023 policy and replaced with a service request
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Complaints Policy sections 10 and 11	BHA operates a 2 stage complaints process, and, throughout any part of the complaint's procedure, residents are reminded they can access the Housing Ombudsman service
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Not applicable to BHA	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Not applicable to BHA	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for	Yes	Complaints policy 6.1, 6.2, 6.6 and 7.9	The policy outlines the handling code definition of a complaint. It outlines that clarification will be sought if any part of the processes is unclear

	clarification.			
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Complaint Policy 10.3, 10.4 and 11.6	The policy outlines the steps BHA will take when acknowledging, clarifying, and investigating a complaint.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	Complaints Policy 5.2 and 7.9	The complaints handler will adhere to all the code requirements in relation to the stages of the complaints process and ensure transparency, conflict of interest, consider all evidence independently and with an open mind
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Complaints Policy 10.6, 10.7, 10.8, 11.7, 11.8	This section of the complaints policy explains the timescales for extensions to the investigation, when this can be expected, how the resident will be kept informed and how they can make another complaint during this time
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010.	Yes	Complaints Policy 3.2, 4.5, 4.6,5.1, 5.2, 6.6, 7.2, 7.3,7.4 7.5, 7.7,7.8,7.9 and 14.2	Section 3.2 outlines the policies and regulation that BHA have in place that

	Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.		BHA Equality Policy BHA risk assessment – staying connected visit	underpin the complaints policy. 4.5 and 4.6 outlines to the board and residents in our reporting systems of the number of residents that have reported complaints who fall under the protected characteristics Section 7 explains the support processes in place for those residents that require help to log a complaint. BHA will make any reasonable adjustments required to break down barriers to complaints. BHA will look at any emerging themes and lessons learnt to ensure this is not due to any barriers for those that fall under the Equality Act 2010
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Complaints Policy 1.3, 1.4, 2.2,5.1,5.2, 6.2, 6.4,6.5, 6.6, 6.7, 7.1, 7.2 7.3, 7.7, 7.8 and section 13 Unreasonable behaviour policy Equality Policy	The policy outlines the discretion that can be applied when assessing complaints. Details of how to proceed outside of the complaint process is given. We are committed to making the process fair and will not refuse to escalate unless

				with a valid reason, as set out in the policy, each complaint is considered on its own merit
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Complaints Policy 4.4, 8.1, 8.2, 8.3, 10.2, 10.6, 10.14 11.3,11.11, 11.12	The Business Support officer and complaints handler are responsible for the logging and detailing of each complaints case, this is kept within a password protected spreadsheet. All stages are recorded, and individual folders are made for each complaint. All investigation notes and letters and recorded in this folder.
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Complaints Policy	Our approach is to try to resolve the complaint to the tenant's satisfaction throughout the process. This includes asking the tenant how they would like their complaint resolved and/or what outcome they are seeking.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular	Yes	Case management meetings Complaints Policy section 13 Unreasonable behaviour policy	BHA's unacceptable behaviour policy is reviewed every three years or when a significant change has occurred within the association. We also keep a log of cases that are

	review.			regularly reviewed through our case management systems and within 121 sessions where relevant. Section 13 of the policy outlines all the behaviours we would consider unreasonable
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Complaints Policy 3.2, 5.1, 7.7, 13.6 Unreasonable behaviour policy Equality Policy	3.2 5.1, 7.7 and 13.6 clearly outlines our unreasonable behaviour exclusion list and unreasonable behaviour policy takes into account and is proportionate and demonstrates regard for the provisions in the Equality Act 2010,

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Complaints policy 5.2, 6.6 7.8, 7.9 and 10.1	The policy outlines the requirements for quick resolution, to apologise for mistakes made and to learn from these mistakes. It also outlines the process to minimise the timescales of responses considering tenants vulnerabilities Each complaint will be assessed on its own merit
6.2	Complaints must be acknowledged, defined, and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received.</u>	Yes	Complaints policy 10.2 and easy to read guide	5 working days to acknowledge and log is contained with the policy
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Complaints Policy 10.6 and easy to read guide	10 working days for a response is detailed in the policy and within the guide
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response.	Yes	Complaints Policy 10.7 and easy to read guide	10 working days for an extension detailed in the policy and within the guide, outlining we will ensure we keep the resident informed

	Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaints Policy 10.8 and 12.1 and easy to read guide	The resident is given information at each stage of the complaints process, advising them of their rights and contact details
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Complaint	Complaints spreadsheet will track any actions required following on from the response letter
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Complaints letters – Appendix 2 and Appendix 4	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues	Yes	Complaints Policy 10.9 and 10.10	This section clearly outlines the residents' rights to make further complaints and our process to deal with these during an investigation

	must be logged as a new complaint.			
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	Complaints Policy – Appendix 2	Appendix 2 is the letter template that all staff use at stage 1 formal response. This template guides staff on how to respond and what information is required

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Complaints Policy 11.1 and 11.2 and easy to read guide	The complaint policy advises residents that stage 2 is BHA final stage of the complaints process
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaint's procedure within five working days of the escalation request being received.	Yes	Complaints Policy 11.2 and easy to read guide	Stage 2 acknowledgement is 5 days after receipt. This is outlined in the policy and easy to read guide
6.12	Residents must not be required to	Yes	Complaints Policy 11.5	Section 11.5 outlines the

	explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.			changes to the 2023 policy for the requirements for residents not to have to explain their reasons for an escalation to stage 2
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Complaints Policy 11.2	Middle managers deal with stage 1 complaints and senior managers with stage 2
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	Complaints Policy 11.10 and easy to read guide and website	20 working days for a response is detailed within the policy
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Complaints Policy 11.7 and 11.8 and easy to read guide and website	20 working days for an extension detailed in the policy and within the guide, outlining we will ensure we keep the resident informed
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Complaints Policy 11.3 and 12.1 and easy to read guide and website	The right to contact the ombudsman through all stages of the investigation are outlined in the policy
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Service standards and Appendix 2 and 4	The outcome letters will advise the residents of the actions and timelines, these will be tracked via the complaints spreadsheet to ensure all actions are completed. The resident will be updated of the progress

				of each action
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Complaint Policy – Appendix 4	The complaint response template letter will guide staff to all the points to cover in the full and final response.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	Complaints Policy – Appendix 4	Appendix 4 is the letter template that all staff use at stage 2 formal response. This template guides staff on how to respond and what information is required
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Complaints Policy section 11, easy to read guide and website	The policy outlines the stage 2 complaint of the final stage within BHA and that senior staff are responsible for all stage 2 responses

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	Complaints Policy 5.2 and 7.9	These sections outline the approach and steps we will take to acknowledge the lessons learnt from the complaints and the steps we will take to put things right and change the service delivery.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaints Policy Home loss and disturbance Compensation	BHA have a clear and comprehensive home loss and disturbance policy which outlines any financial remedy to be applied to any form of compensation requirements arising from a complaint
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Complaints Policy – Appendix 2 and 4	In the formal response letters to the residents, it will outline actions that will be taken, with clear timelines for remedy

7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Complaints Policy 3.2, 5.2, 7.9 and 12.3	BHA will take account to all guidance issued by the Ombudsmen, this is outlined throughout the complaints policy
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Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>Complaints Policy A, 4.5 and 12.3 B, 4.5, 4.6 and 4.7 C, 4.5, 4.6 and 4.7 D, 4.5, 4.6, 4.7 and 12.3 E, 4.5, 4.6, 4.7 and 4.8 F, 4.5, 4.6, 4.7 ,4.8 and 12.3</p>	<p>BHA reports quarterly to the Board members the complaints statistical information, themes and risks associated to the complaints received, any cases that are within ombudsman jurisdiction and would report if any non-compliance was reported by the ombudsmen. The annual report includes the performance of complaints through the year</p>
8.2	The annual complaints performance and	Part	Tenant satisfaction measures –	BHA for the first time

	<p>service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.</p>	compliant	<p>3.2 BHA Board members – section 4.5 to 4.8 Links to the annual report are on the website in the complaints section relating to overall annual report on performance, BHA do not publish annual reports until December 2024 for which an annual overview will be provided in line with the code</p>	<p>reported the TSM satisfaction survey results to the regulator this included satisfaction on complaints. BHA board members receive regular updates and overviews of the complaints, with an end of year report on the trends and themes.</p>
8.3	<p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	Yes	Complaints Policy 12.5	<p>This requirement is outlined in the complaints policy</p>
8.4	<p>Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.</p>	Yes	Complaints Policy 12.4	<p>This requirement is outlined in the complaints policy</p>
8.5	<p>If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.</p>	Yes	Complaints Policy 12.6	<p>This requirement is outlined in the complaints policy</p>

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.		Lesson Learnt report – to the board Tenants annual report	Our approach is to learn wider lessons from any complaint and publish lessons learnt
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Complaints policy 4.6, 4.7 14.1,14.2,14.3 14.4, and 14.5	BHA board champion and the Housing and Communities Director are responsible for embedding positive complaint culture throughout the association. They will oversee the implementation of changes where required f and ensuring lessons learnt are core to changes to service delivery
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Residents panel – KPI scrutiny Residents annual report - lessons learnt Board reports	A lessons learnt report will be included in the agenda for the Residents Panel each year Board reports on annual lesson learnt and the MRC will have oversight on all reports relating to the complaints handling
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require	Yes	Complaints Policy 4.3, 4.6, 4.7 and 8.4	The Housing and Communities Director is the designated complaints handler and has the overall responsibility for complaints for the association, which includes reporting to the

	revision.			regulator and board, identifying any themes or risks, and reviewing policies in line with regulations and changes to the business need. The board champion has an overall responsibility for ensuring positive complaint handling culture in the association
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Complaints Policy, 4.5, 4.6 and 4.7	A board champion is appointed to have lead responsibility for complaints to support a positive complaint handling culture.
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Complaints Policy, 4.5, 4.6 and 4.7	The Board champion will oversee the compliance with regulatory requirements, adherence to the handling code and received regular information relating to complaints
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends	Yes	Complaints Policy, 4.5, 4.6 and 4.7	The board champion meets with the complaint's handler on a regular basis to receive updates and information relating to the handling code requirements

	<p>arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	Complaints Policy, 4.1 4.5, 4.6 4.7, 4.8, 5.2, 5.3	<p>All staff members where relevant are involved in the efficient and timely completion and closure of complaints</p> <p>The definition and actions BHA take is consistent across the board on how we are dealing with complaints, each department responsible for delivering actions and outcomes arising from a complaint.</p> <p>Feedback on complaints is shared with staff so a positive learning environment is created.</p>